

UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

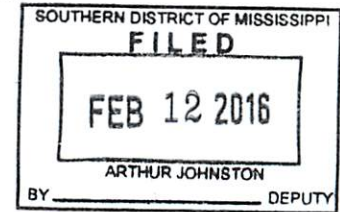
United States of America

v.

Melissa R. Brewer
and Mark A. Hanks

Case No.

1:16mj10-JCG



Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 11, 2016 in the county of Harrison in the
Southern District of MS, Southern Division, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. § 841(a)(1)

Possession with Intent to Distribute a Controlled Substance, to wit, 500
grams or more of methamphetamine.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Complainant's signature

Jason Elder, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/12/2016City and state: Gulfport, MS
Judge's signature

John C. Gargiulo, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

STATE OF MISSISSIPPI
COUNTY OF HARRISON

I, Jason Elder, being first duly sworn, hereby depose and say that:

1. I am a special agent with the Department of Homeland Security, Homeland Security Investigations (HSI) and have been since May 2007. As a Homeland Security Investigations special agent, I have attended training courses which provided specialized training in the area of immigration and immigration related fraud. Prior to my present employment, I was employed by United States Customs and Border Protection in Gulfport, Mississippi, and was employed by the Harrison County Sheriff's Department, Gulfport, Mississippi. During the course of my law enforcement employment, I have been involved in various types of criminal investigations including, but not limited to homicide, burglary, and fraud

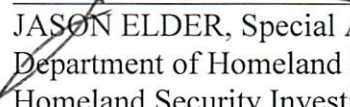
2. On February 11, 2016, at approximately 11:00 a.m. a confidential informant was utilized to purchase approximately one ounce of methamphetamine from an unknown white male at room 243 of the Motel 6 located 9355 Highway 49, Gulfport, Mississippi. The confidential informant advised Mississippi Bureau of Narcotics Agent Luis Hawkins that there was a large amount of methamphetamine in the hotel room. Agents continued to monitor the outside activity of room 243. At approximately 11:30 a.m., a black Nissan Altima displaying Mississippi license plate KBH 689 arrived. A white female later identified as Melissa R. BREWER exited the vehicle and began to walk towards the hotel. The door to room 243 opened and a white male later identified as Mark Anthony HANKS escorted BREWER into the room.

3. A short time later BREWER and HANKS exited the room. BREWER entered into the aforementioned Nissan Altima while HANKS spoke with the housekeeping staff. BREWER exited the vehicle and said something to HANKS. As both BREWER and HANKS began to enter the vehicle agents ordered them down on the ground. BREWER was lying on top of approximately one ounce of methamphetamine and HANKS had a small container with marijuana. Both were advised verbally of their Miranda rights. A search warrant was issued by Justice Court Judge Louise Ladner for room 243 of the Motel 6.

4. Agents with Homeland Security Investigations and Mississippi Bureau of Investigations searched room 243 and located several individual bags of methamphetamine. Agents found a total of 554 grams of methamphetamine in the room and on the BREWER's person. Agents located \$10,140 of United States currency in a small bag. HANKS and BREWER were transported to the Homeland Security Investigations office. BREWER gave written consent to search her vehicle. Agents located a spare tire in the trunk. The spare tire had a large cut in the tire.

5. Agents advised HANKS of his rights per Miranda. HANKS agreed to give a statement to Agents Elder and Hawkins. According to HANKS, he had previously come to Mississippi in December 2015 at which time he brought 24 ounces of methamphetamine. BREWER sold the narcotics to individuals in the Picayune, Mississippi area. HANKS further stated BREWER came to Texas on February 9, 2016 to pick him up and bring him back to Mississippi. According to HANKS, he and BREWER brought 37 and half ounces of methamphetamine back to Gulfport, Mississippi on February 10, 2015. BREWER took HANKS to the aforementioned Motel 6 where a room was rented in BREWER's name. HANKS advised that the methamphetamine was hidden in the spare tire of BREWER's vehicle. The methamphetamine was field tested and yielded a positive result for the presence of methamphetamine.

5. Based on the aforementioned facts and circumstances, your affiant believes there is probable cause that Melissa R. BREWER and Mark Anthony HANKS have violated Section 841(a)(1), Title 21, United States Code, possession with intent to distribute 500 grams or more of methamphetamine.



JASON ELDER, Special Agent
Department of Homeland Security
Homeland Security Investigations

Sworn and subscribed before me the 12 day February, 2016.



UNITED STATES MAGISTRATE JUDGE